LIBBY ASBESTOS SITE
OU-2

Lerah Parker's Comments
OU-2 [illegible]
Vol 10

Lerah
Parker

LIBBY ASBESTOS SITE.
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OU-2 sub-area 1
1/09/10

Lerah
Parker

Purposed Comments on unit #2 sub-area 1

COMMENT #1 **PLEASE EXPLAIN**

Risk assessment for sub-area #1 After a 6 year clean-up and now that the ROD is before us. I want to know how you can just come up with a risk assessment that supports a quantitative evaluation of potential risks to humans. During the last 10 years I have ask at each GAG meeting 'what is the risk fact or number that we have to deal with so we can move on with our lives a start another commercial business on our property". Page 8 says ***NO DATA*** exists to support a quantitative evaluation of potential risks to human who might disturb contaminated surface soil.

On pg. 7 OF THE PROPOSED PLAN FOR PUBLIC COMMENT OU-2

Exhibit 6. Summary of current status of exposure pathways after past response actions.

LA exposure to workers trades persons, recreational visitors and future residence from the general ambient air. ***What about the dust from the haul trucks going up Rainy Creek Road. and the new dump site of contaminated material from town 2 miles up Rainy Creek road. A new pathway. That pile of contaminated soil is not covered or wet down ever!***

LA exposure to workers, trades persons, recreational visitors, and future residence from outdoor air near the highway. ***Haul trucks to and from the mine site leave dust on the road that is not wash off every load especially on hot dry days.***

However if there was a monitor by the stop sign maybe you would understand more about the air and dust.

La exposure to workers, trades persons, and future residents from contaminated soil tracked inside buildings. You say pathways eliminated by past response actions. That is not true! Rainy Cr. and the mouth of Rainy Cr. will always have a problem and there is definitely an open pathway. But of course it's in Unit #3. Out of our control.

LA exposure to workers, trades persons, recreational visitors, and future residents from disturbed contaminated soil. ***You say pathways partially eliminated by past response actions.*** Partially eliminated!! What about that? Please comment!

Comment #2

Methods for quantification of cancer and non- cancer risk from ***inhalation exposure*** to asbestos are still ***under development.(pg. 7) Well wake up EPA we do not need a ROD until this is addressed.***

Purposed Comments on unit #2 sub-area 1

We are all not sleeping dogs in Libby, MT and as for you Mr. Ted Linnert you can not stifle all of us during meeting and continue to disenfranchise this community.

Comment #3

A ROD should not be established in OU-2# sub- area #1 because the ecological risk has not yet been addressed for OU2. The EPA says it will be conducting a comprehensive assessment of ecological risks as part of OU3 work (the mine site) that will address ecological risk for OU2. So why is the ROD so important now?

Comment #4 Imminent danger!

In 2000 when EPA did the clean-up on our property, we were very persistent to know ***WHY*** the clean-up was so thorough and yet no data was given to us on the clean-up procedures. Today and over the past several years we look back and are amazed at the clean-up procedures. Boy have they changed. The devastation to us you will never know. But during this comment period I want you to explain the difference procedures so that this will not happen to other folks during a clean-up site. where there has been no complete risk assessment done.

1.) You destroyed all the green houses (made of galvanized round welded steel tube framed replacement value $173,856.60 you paid us $130,392.00) that were on permanent foundation asphalt pads. The procedure in 2003 was if the secondary structure were on permanent foundations ***leave in place***. don't excavate beneath. Document remaining contamination. record in database.

2.) The long shed was also all metal. on a 12" concrete foundation made of pipe and metal. (140 x 280 = 39,200 sq. ft 30 ft welded iron high walls) on a permanent foundation.(12in. reinforced concrete slab throughout. Note: See 2003 Criteria Decisions Design enclosed. You not only tore down the long shed you purposely destroyed the cement foundation by drilling holes on the 12" slab so we could not use it again 2003 procedures ***leave in place.***

3.) A system of tunnels ran under the long shed . An L shape approximately 470 ft. in length and 5ft. wide and 6-2uin height. A second tunnel 370 ft. 6-6ft. in width and 7-6 in height interior area of approximately 28,500 cu. ft . The tunnel floors, walls and ceiling are 12in. thick all distorted. See picture enclosed: We can go on and on with regard to the clean-up on our property .

4.) Concrete paving (10,400 sq. ft). and 99,000 sq. ft of asphalt paving. destroyed, again note the criteria for 2003. ***Leave in place***

Purposed Comments on unit #2 sub-area 1

5.) ***Our*** Vehicles all destroyed but only after the Sub contractors were done using them . See pictures enclosed.
2003 criteria Vehicles to be treated like interior of house.
Look at these contractors vehicles and trucks they were not destroyed!!

6.) House destroyed completely . Household items - wet wipe to clean Our were destroyed. ***Clean , check air quality, and leave in place.***

7.) Even the well was contaminated by the personnel of the sub-contractors.

We were the only home and business in Libby to be completely destroyed
See enclosed pictures.

The EPA and it sub-contractors made sure the Parkers would ***NEVER be able to conduct any part of our nursery business on this property again.*** Due to their complete destruction.

By the way EPA did negotiate with WR Grace for the City and Millwork West, and also for the Golf Course in 2009 for a clean-up and settlement with out going out of business and being able to stay in business all the while letting customers be exposed to LA for the last 10 years. Our home and business just gone.

Lesson learned: ***A person can not ask questions of the EPA and their contractors because all you do is piss off the EPA and you never get answers.***

It's 10 years down the road. We have no risk assessment with proven data about toxicity or epidemiological studies.

Comment #5

On comment #4 I have 7 issues I would hope you would justify all your answers for this record of decisions. On going clean-up is still going on in Libby because of the LA.

Comment #6 ***Imminent danger***

In 1999 we were in imminent danger, and lost every thing. Now 2010 are we again in the same situation? The huge 120.000 cu. yds. of contaminated material up the Rainy Creek. Rd 2 miles, may once again put our property in imminent danger. should there be a heavy snow fall or heavy rain with substantial run off of water and mud

SO why a rod now? With so many unanswered questions.

Comments submitted by Lerah Parker PO Box 609 Libby, MT 59923 406-293-9705

DESIGN CRITERIA DECISIONS

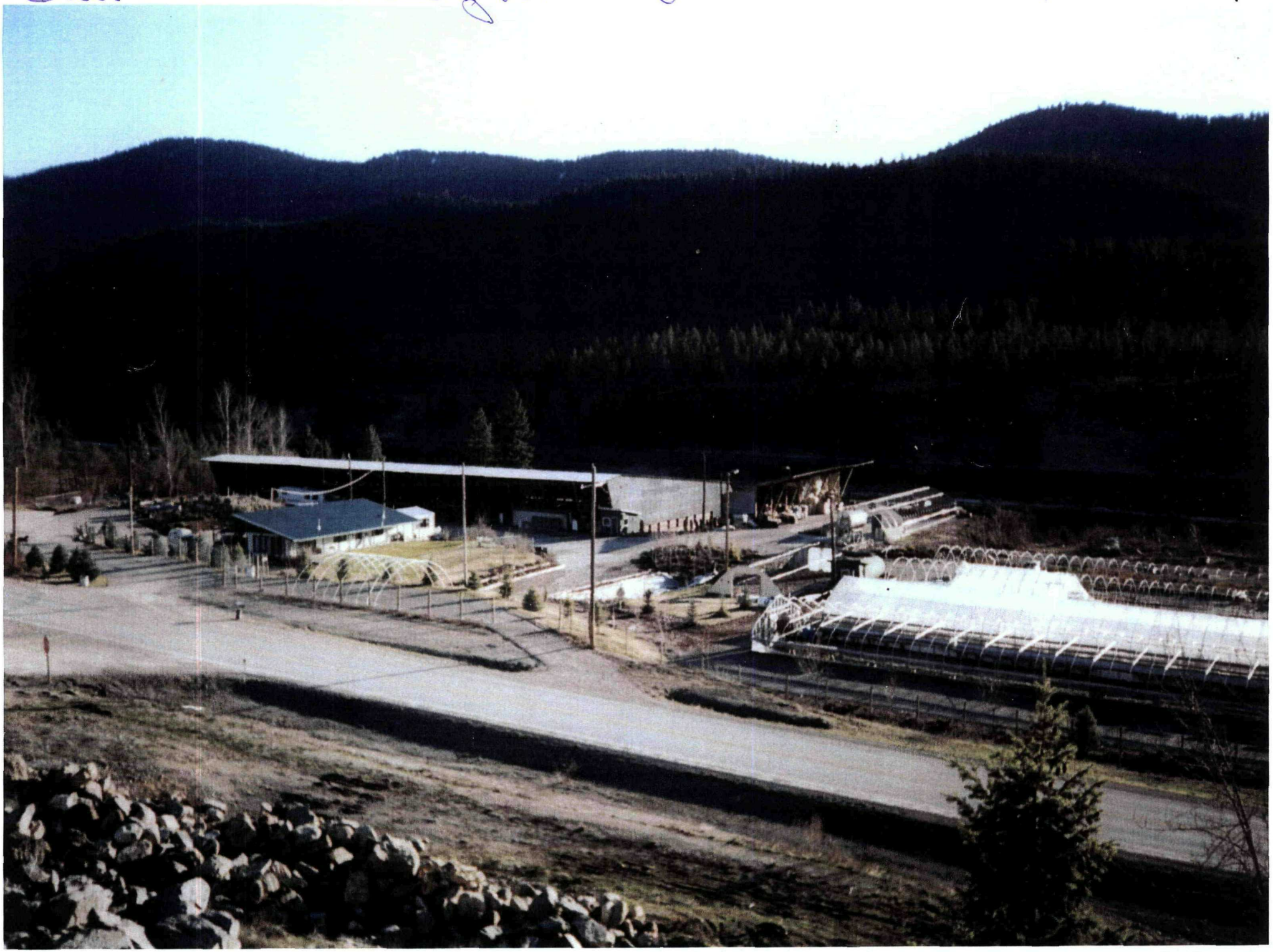
Design Element	Design Criteria
Criteria for removing trees	➢ If gross contamination extends beneath a tree, remove it unless the property owner wants to keep it ➢ If low levels of contamination extend beneath a tree, then: - If tree is > or = 6" caliper – do not remove; excavate to drip line, use vacuum truck to remove top 6" inside drip line, backfill with topsoil - If tree is < 6 " caliper – remove unless property owner wants to keep it
Criteria for removing driveways	Only when there is risk of exposure due to deteriorated wearing surface and exposed vermiculite beneath the driveway
Criteria for removing walks	Only when there is risk of exposure due to deteriorated wearing surface and exposed vermiculite beneath the walk
Criteria for removing decks	➢ If deck is on the ground, do not remove it; leave contamination in place ➢ If deck is off the ground sufficiently to allow a person or pet beneath it, but not far enough off the ground to readily excavate, consider shotcrete to encapsulate; remove deck as a last resort ➢ If deck is far enough off the ground to allow vacuuming or excavation, leave deck in place and work around it
Criteria for removing sheds, carports, and other secondary structures	➢ If permanent foundation, leave in place; don't excavate beneath ➢ If skid-mounted, move structure and excavate beneath ➢ If skid-mounted, but not structurally stable, demolish and replace in kind
Criteria for removing/replacing fences	Remove/replace in kind whenever necessary to excavate contaminated soil
Criteria for removing insulation in walls	➢ If insulation can be accessed readily from openings in top of wall from attic, vacuum out what can be reached ➢ If insulation can't be reached from openings in top of wall, leave in place, but if exposed around a switch or outlet, use foam insulation to seal opening

Permits needed?	In general no; if there is a permit required for replacing decks or driveways, the removal contractors will be responsible to obtain
Contractors need licenses from State for asbestos abatement?	No, but must meet any substantive requirements, such as training of workers (will recommend they get licensed, but will not require it)
Where dispose of contaminated soil? Perform cost-benefit analysis?	Mine site, unless need in landfill to balance Yes
Where dispose of VCI?	In landfill
Pay tipping fees at landfill?	Yes
Prepare final data documentation (FDD) files for residents?	Yes
Prepare and maintain residential closeout folders?	Yes
How handle septic systems?	Only if encountered during other remediation, remove vermiculite backfill; removal contractors responsible to ensure their operations don't damage them
Equipment decontamination procedures (wrap versus full decon)	Wrap tracks/wheels if transporting to another removal location
Portable equipment decon facilities?	Yes, as long as makes sense economically
Documenting "remaining contamination" (i.e. inside walls, beneath driveways)	➢ Keep in database/GIS ➢ Add to property summary report given to property owner prior to removal ➢ Add to letter to property owners after property has been remediated ➢ Add to FDD and close-out documentation
How handle substandard electrical in attics when have to remove insulation?	Tell removal contractors to avoid touching; if absolutely necessary to move, will replace circuit and breaker box to meet code
How handle residents who want to remodel their attic and want to maximize the building materials demolished during attic insulation removals?	Accommodate property owner requests if no additional cost to government, but do not incur additional costs
Notice given to property owners	➢ Give minimum of two weeks notice before actual start date ➢ Attempt to give a general timeframe ahead of that

Sampling protocol for air monitoring – personals; background; perimeter, outside containment; clearance	To be developed by CDM for EPA and Volpe approval
Analytical protocol for soil, air, and dust for various samples	To be determined; current protocol for all media and analytical methods to be reviewed and finalized with EPA for future work
Using topsoil versus residential fill	Use topsoil in top 6" and residential fill below that
Using sod versus seed	➢ CDM will develop a proposed maximum square footage of sod to be replaced in kind; anything above that will be hydroseeded ➢ If area to be restored is native grasses, it will be replaced with a separate seed mix
Criteria for replacing trees, shrubs, and flowers	➢ CDM will develop a tree and shrub selection guide for property owners to pick from ➢ Replace trees with a 2 ½ " – 3" tree of the selected variety; if replacing a tree with > 12" caliper, replace with 2 trees ➢ Flowers to be replaced in kind
Criteria for procuring, testing, and approval of topsoil and residential fill sources	➢ CDM to assist Volpe develop specs, will revisit sampling frequency (currently sampling for chemical, asbestos and nutrients every 5,000 cy) ➢ Volpe will procure separately ➢ Testing required by supplier; CDM approve (CDM will visit each source)
Collect dust samples on houses with VCI, but no exterior contamination?	Yes
Collect dust samples on houses with exterior contamination but no VCI?	Yes
Collect dust samples on houses with no exterior contamination and no VCI?	Only if there is a "secondary source" issue (e.g. asbestos related disease, mine worker, Grace employee
Collect dust samples in secondary structures (i.e., detached garages) if exterior contamination exists?	Yes
When complete a survey for properties	Complete survey for all properties with exterior contamination (except when only removal is flower beds or planters immediately adjacent to the house), only in those areas that will be excavated or where we will leave material; include property boundary survey for those areas also
When complete a survey after restoration finished	For every property that had a survey prior to excavation
Use misters on fences?	No – will collect perimeter air samples to determine if additional engineering controls are necessary
Visquine on house openings versus entire	Yes

Criteria for removing insulation in block walls	Leave in place
Criteria for removing contaminated soils in basements and crawl spaces	➢ If floor is concrete slab, leave in place ➢ If floor is soil, CDM to perform cost analysis to evaluate using shotcrete to encapsulate versus using vacuum truck to remove top 6" and backfilling with residential fill
Criteria for removing building materials with visual vermiculite	Evaluate on a case by case basis – may remove if it is determined to be friable
Criteria for removing contaminated soils under mobile homes	➢ Generally, support trailer, remove skirt and use vacuum truck to remove soil to 6" deep and backfill with residential fill ➢ If several trailers are located adjacent to each other, determine approach on a case by case basis (evaluate leaving trailers in place versus moving them)
Criteria for cleaning (i.e., wet wiping) outside household items (i.e., bikes, lawnmowers, grills) that exist on contaminated soil	➢ Clean if item are in direct contact with soil containing vermiculite ➢ If items are in contact with grass, move without cleaning, unless they are grossly contaminated
Criteria for cleaning vehicles being stored in secondary structures	Treat like interior of houses; that is, clean if covered with visible vermiculite or collect dust samples if meets criteria for sampling, then clean if test results are positive
How handle finished attics – demolish everything necessary to get insulation out – walls, ceiling, and floors?	Yes, unless the material is totally contained within an area without access
Collect PLM samples for other ACM, such as chrysotile?	Jim to check with State – Tentatively: If must demolish an obvious or suspected ACM to access insulation, don't sample, rather just dispose of in asbestos landfill
Test for lead-based paint?	Jim to check with State – Tentatively: If age of structure makes lead-based paint a possibility, sample the painted surface if must demolish it to access insulation
Also, remove other insulation to pass clearance?	Yes
Action levels/cleanup criteria ➢ Soil – when to excavate; when to stop excavating ➢ Air – perimeter; outside	Note: action levels are still being evaluated by EPA; visual vermiculite will likely no longer be used as an action level except in flower gardens and planters; the following action levels are the ones currently being used: ➢ < 1% at surface; < 1% at depth ➢ ND; ND; 1 structure (both VCI removal and

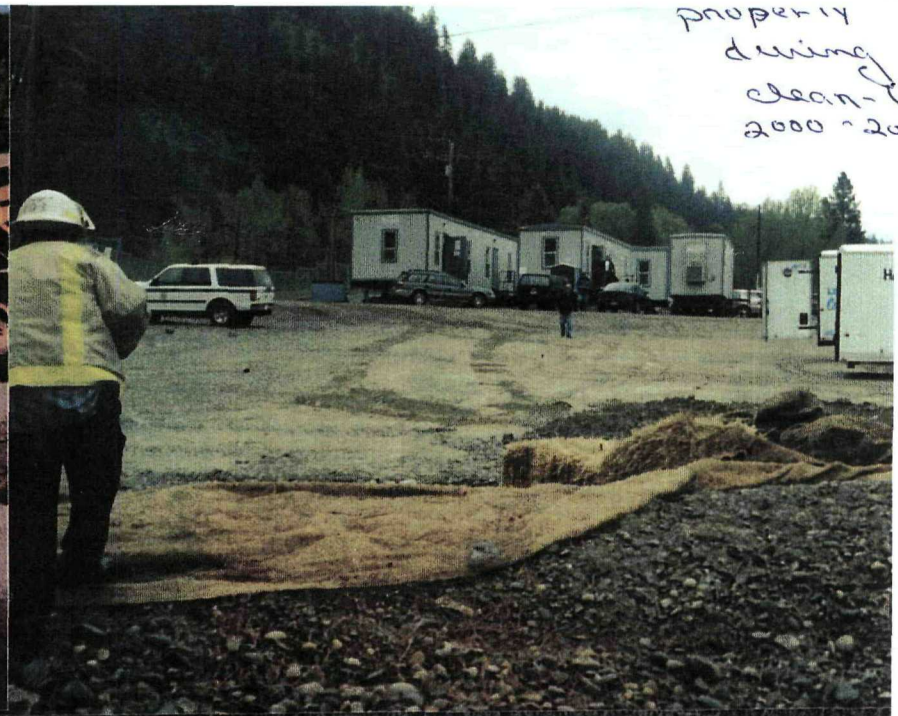
Our Raintree Nursery 1999 - Before EPA clean-up.




Aug 2003
after EPA Clean-Up

Contractors Vechiles & trucks during clean-up.

CDM, EPA & Volpe Trailers on site property during clean-up 2000 - 2003



contaminated material being loaded.

personel vechiles of employies of marco. during clean-up!

Our home + Business.

Long Shed.

Our vehicles at New dump site
2miles up R.C. Road 2009 2004 yds-

Destruction of tunnels
during clean-up-